

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA

v.

HAZEM ZIAD AWAUDEH

§
§
§
§
§

No. 1:17-CR-48(4)
Judge Marcia A. Crone

ELEMENTS OF THE OFFENSE

COMES NOW, the United States of America, by and through the United States Attorney for the Eastern District of Texas, and files this pleading summarizing the elements of the offense to which the Defendant intends to enter a plea of guilty to Count One of an information, which charges a violation of 18 U.S.C. § 1343, Wire Fraud.

For the defendant to be found guilty of this crime, the government must prove each of the following beyond a reasonable doubt:

1. That the defendant devised a scheme to defraud or to obtain money or property by materially false or fraudulent pretenses, representations or promises or willfully participated in such a scheme with knowledge of its fraudulent nature;
2. That the defendant acted with the intent to defraud
3. That in advancing, furthering, or carrying out the scheme, the defendant transmitted any writing, signal, or sound by means of a wire, radio, or television communication in interstate commerce or caused the transmission of any writing, signal, or sound of some kind by means of a wire, radio, or television communication in interstate commerce.

Respectfully submitted,

ALAN JACKSON
UNITED STATES ATTORNEY

/s/ Christopher Tortorice

CHRISTOPHER TORTORICE

Assistant United States Attorney

Texas Bar No. 24048912

350 Magnolia, Suite 150

Beaumont, Texas 77701

(409) 839-2538

(409) 839-2550 (fax)

email: chris.tortorice@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of these Elements of the Offense was delivered to counsel for the Defendant, on this the 22nd day of January 2018, by electronic filing.

/s/ Christopher Tortorice

CHRISTOPHER TORTORICE

ASSISTANT UNITED STATES ATTORNEY